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VIA ECF

Honorable Vincent F. Papalia, U.S.B.J.
United States Bankruptcy Court
District of New Jersey
50 Walnut Street
Newark, New Jersey 077102

**Re: In re William J. Focazio
Bankr. Case No. 19-10880**

Dear Judge Papalia:

This Firm represents Edward A. Philips, Chapter 11 trustee (the "Trustee") of the estate of the above-referenced debtor, William J. Focazio (the "Debtor"). As the Court is aware, the Court entered an Order Approving Settlement Between the Debtor and the Chapter 11 Trustee on March 8, 2021 [Dkt. 266] ("Settlement Order") which provided for the structured dismissal of this Case. Due to issues relating to the loss of funding, the Debtor was unable to make the Initial Payment when required and the Case remained open pending the Debtor's efforts to obtain replacement financing in his related business cases.

As the Court is aware the Debtor has obtained replacement funding and has made the Initial Payment to the Trustee. Pursuant to Paragraph 12 of the Settlement Order, the Trustee arranged for the return to the Debtor of the Personal Property identified in the Settlement Order. Upon retrieval, the Debtor noted that there was damage to certain watch boxes.

On behalf of the Trustee and counsel to the Debtor, we write to respectfully request that the Court hold a telephone conference to address the issue as the Trustee and the Debtor are not in agreement as to payment of the amount at issue.

If the Court has time on its calendar for one day next week, we would appreciate the benefit of the Court's time so that we can resolve the matter and close the Case.

Respectfully submitted,
/s/ Stephen Falanga
Stephen V. Falanga

cc: All Counsel of Record (via ECF)